### **EXHIBIT B**

**Proposed Bridge Order** 

## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

## Caption in Compliance with D.N.J. LBR 9004-1(b) COLE SCHOTZ P.C.

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Attorneys for Debtors and Debtors in Possession

In re:

BLOCKFI INC., et al., Debtors.<sup>1</sup> Chapter 11
Case No. 22-19361 (MBK)
(Jointly Administered)
Hearing Date and Time:
March 13, 2023 at 10:00 a.m. (ET)

# BRIDGE ORDER PURSUANT TO 28 U.S.C. § 1452 AND FEDERAL RULES OF BANKRUPTCY PROCEDURE 9006 AND 9027 EXTENDING THE PERIOD WITHIN WHICH THE DEBTORS MAY REMOVE ACTIONS

<sup>&</sup>lt;sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

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Debtors: BlockFi Inc.

Case No. 22-19361(MBK)

Caption of Order: BRIDGE ORDER PURSUANT TO 28 U.S.C. § 1452 AND FEDERAL

RULES OF BANKRUPTCY PROCEDURE 9006 AND 9027 EXTENDING THE PERIOD WITHIN WHICH THE DEBTORS MAY REMOVE

**ACTIONS** 

The relief set forth on the following pages, numbered three (3) through four (4), is hereby **ORDERED**.

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Case No. 22-19361(MBK)

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**ACTIONS** 

THIS MATTER having been opened to the Court by Cole Schotz P.C., Kirkland & Ellis LLP, Kirkland & Ellis International LLP, and Haynes and Boone, LLP, attorneys for BlockFi, Inc., *et al.*, on behalf of the Chapter 11 debtors and debtors-in-possession (collectively, the "Debtors"), upon a motion for entry of an Order extending the time within which the Debtors may file notices of removal pursuant to 28 U.S.C. § 1452 and Federal Rules of Bankruptcy Procedure 9006 and 9027 (the "Motion");<sup>2</sup> and the current time within which the Debtors may file notices of removal pursuant to 28 U.S.C. § 1452 and the Federal Rules of Bankruptcy Procedure 9006 and 9027 expires on February 26, 2023; and good cause appearing for the entry of this Bridge Order;

#### It is **ORDERED** as follows:

- 1. The Motion be, and hereby is, **GRANTED** on a temporary basis pending final approval of the Motion by this Court.
- 2. The removal period set forth in Federal Rules of Bankruptcy Procedure 9006 and 9027 is hereby extended through and including the date by which the Court enters a final order with respect to the Motion.
  - 3. This Bridge Order is effective immediately upon entry.
- 4. The Debtors' counsel shall serve a true copy of this Bridge Order on all interested parties within seven (7) days of the date hereof.
- 5. All parties in interest reserve any and all of their rights with respect to the final determination on the Motion.

<sup>&</sup>lt;sup>2</sup> All capitalized terms used but not otherwise defined herein shall have the same meanings ascribed to them in the Motion.

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**ACTIONS** 

6. This Bridge Order is without prejudice to the Debtors' right to seek further extensions of time within which to remove the Actions.

- 7. The Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Bridge Order.
- 8. This Court shall retain jurisdiction with respect to all matters arising from or relating to the implementation of this Bridge Order.